

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>SECOND AMENDMENT ARMS, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>No. 10-CV-4257</b>
	)	
<b>v.</b>	)	<b>Hon. Robert M. Dow, Jr.</b>
	)	
<b>CITY OF CHICAGO, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**AGREED MOTION FOR AN EXTENSION OF DISCOVERY SCHEDULE**

Plaintiffs Second Amendment Arms, R. Joseph Franzese, and Tony Cole (collectively, “Plaintiffs”), by their attorney, David G. Sigale of the Law Offices of David G. Sigale, P.C., and Defendants City of Chicago, Mayor Rahm Emanuel, Superintendent of Police Eddie Johnson, and City Clerk Susana Mendoza (collectively, “Defendants”), by their attorney, Stephen R. Patton, Corporation Counsel (together with Plaintiffs, “Parties”), respectfully move this Court to extend the discovery schedule previously entered in this matter. In support of this motion, the Parties state as follows:

1. On May 6, 2016, the Parties filed a proposed agreed scheduling order with the Court. Dkt. No. 194. The Court adopted the deadlines set out in the Parties’ proposed order on May 13, 2016. Dkt. No. 195. The order provided, *inter alia*, that written fact discovery would close on July 6, 2016, and oral fact discovery would close on October 6, 2016. *See* Dkt. No. 194. The Court set a status hearing for October 4, 2016. Dkt. No. 195.

2. The Parties have proceeded with discovery. At this time, however, some written discovery responses remain outstanding. In addition, the Parties are currently attempting to resolve disputes over certain requests, in compliance with Local Rule 37.2. As a result,

depositions of fact witnesses have not yet been taken.

3. To allow for the completion of fact discovery, the Parties jointly propose that the dates in the discovery schedule previously entered in this matter be extended by three months, as follows:

1. Any outstanding responses to the Parties' written fact discovery requests will be due by October 11, 2016;
2. Oral fact discovery closes on January 10, 2017;
3. Plaintiffs' expert disclosures (if any) will be due by February 10, 2017;
4. Discovery of Plaintiffs' experts closes on March 24, 2017;
5. Defendants' expert disclosures (if any) will be due by April 25, 2017; and
6. Discovery of Defendants' experts closes on June 13, 2017.

WHEREFORE, the Parties respectfully request that the Court grant their agreed motion to extend the discovery schedule and grant them such further relief as the Court deems just and appropriate.

Date: September 23, 2016

Respectfully submitted,

STEPHEN R. PATTON,  
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